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9 *Attorney for Defendant, Anabel Enriquez-Perea*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 ENRIQUEZ-PEREA,

12 Defendants.

CASE NO.: 2:20-cr-00228-APG-BNW

**STIPULATION TO CONTINUE  
CHANGE OF PLEA HEARING**  
(Fifth Request)

13  
14 IT IS STIPULATED AND AGREED, by and between Christopher Chiou,  
15 Acting United States Attorney, and Edward J. Veronda, Assistant United States  
16 Attorney, counsel for the United States of America, and Karen A. Connolly, counsel  
17 for Anabel Enriquez-Perea:

18 That the Change of Plea Hearing currently scheduled for Anabel Enriquez-Perea  
19 on November 9, 2021, be vacated and continued no less than 45 days, to a date and  
20 time convenient to the Court.

21 The Stipulation is entered into for the following reasons:

22 1. On June 14, 2021, the Government provided additional discovery to  
23 counsel for Enriquez-Perea, much of which is in Spanish. It consists of iPhone data  
24 including 866 phone calls. Counsel for the Defendant needs additional time to have  
25 the phone calls listened to by a Spanish interpreter and for pertinent ones to be  
26 translated. Defense counsel has been having trouble finding and obtaining funding  
27 for a Spanish Interpreter/Translator who is able and willing to review the discovery  
28 and translate relevant portions.

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2. On October 20, 2021, a subpoena was served for medical and mental health records from Nevada Southern Detention Center. The records are due November 8, 2021. Counsel for Nevada Southern Detention Center has indicated that a signed authorization is required in order to release the records. On October 26, 2021, an authorization form was sent to Defendant. To date the signed authorization has not been returned.

3. The defendant is in custody and does not object to a continuance.

4. The parties agree to the continuance.

5. The additional time requested herein is not sought for the purposes of delay, but to allow the defendants sufficient time to effectively and thoroughly research and prepare;

6. Denial of this request for continuance could result in a miscarriage of justice;

7. Denial of this request for continuance would deny undersigned counsel sufficient time to effectively and thoroughly review all discovery prior to the change of plea hearing or trial, taking into account the exercise of due diligence; and

8. The additional time requested is excludable in computing the time within which the trial must commence pursuant to the Speedy Trial Act, Title 8, United States Code, Section 3161(h)(7)(A) considering the factors in Title 18, United States Code, Sections 3161(h)(7)(B)(I) and 3161(h)(7)(B)(iv).

9. This is the fifth request for a continuance of the Change of Plea Hearing.

Dated this 2<sup>th</sup> day of September, 2021.

KAREN A. CONNOLLY, LTD

CHRISTOPHER CHIOU  
 Acting United States Attorney

/s/ Karen A. Connolly  
 KAREN A. CONNOLLY  
 Counsel for Anabel Enriquez-Perea

/s/ Edward G. Veronda  
 By: EDWARD G. VERONDA  
 Assistant United States Attorney

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ENRIQUEZ-PEREA,

Defendants.

CASE NO.: 2:19-cr-00251-GMN-  
NJK

**ORDER**

**FINDINGS OF FACT**

Based upon the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the Defendant needs additional time to meet with the defendant and review the recently disclosed discovery in this case, consisting of iPhone data - including 866 phone calls which need to be listened to and translated by a Spanish interpreter. Defense counsel has been having trouble finding and obtaining funding for a Spanish Interpreter/Translator who is able and willing to review the discovery and translate relevant portions.

2. On October 20, 2021, a subpoena was served for medical and mental health records from Nevada Southern Detention Center. The records are due November 8, 2021. Counsel for Nevada Southern Detention Center has indicated that a signed authorization is required in order to release the records. On October 26, 2021, an authorization form was sent to Defendant. To date the signed authorization has not been returned.

3. The defendant is in custody and does not object to a continuance.

4. The parties agree to the continuance.

5. The additional time requested herein is not sought for the purposes of delay, but to allow the defendants sufficient time to effectively and thoroughly research and prepare;

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6. Denial of this request for continuance could result in a miscarriage of justice;

7. Denial of this request for continuance would deny undersigned counsel sufficient time to effectively and thoroughly review all discovery prior to the change of plea hearing or trial, taking into account the exercise of due diligence; and

8. The additional time requested is excludable in computing the time within which the trial must commence pursuant to the Speedy Trial Act, Title 8, United States Code, Section 3161(h)(7)(A) considering the factors in Title 18, United States Code, Sections 3161(h)(7)(B)(I) and 3161(h)(7)(B)(iv).

### **CONCLUSIONS OF LAW**

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant, because the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare, taking into account the exercise of due diligence.

The continuance sought herein is excusable under the Speedy Trial Act, Title 8, United States Code, Section 3161(h)(7)(A) considering the factors in Title 18, United States Code, Sections 3161(h)(7)(B)(I) and 3161(h)(7)(B)(iv).

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**ORDER**

IT IS THEREFORE ORDERED that the Change of Plea Hearing scheduled for Anabel Enriquez-Perea on November 9, 2021, be vacated and continued to January 4, 2022, at 1:30 p.m. in Courtroom 6C.

IT IS SO ORDERED.

Dated this 3rd day of November, 2021.

  
UNITED STATES DISTRICT JUDGE